

1 Roger L. Grandgenett II, Esq.  
Nevada Bar No. 6323  
2 Taylor A. Buono, Esq.  
Nevada Bar No. 15513  
3 LITTLER MENDELSON, P.C.  
8474 Rozita Lee Avenue  
4 Suite 200  
Las Vegas, Nevada 89113.4770  
5 Telephone: 702.862.8800  
Facsimile: 702.862.8811  
6 [rgrandgenett@littler.com](mailto:rgrandgenett@littler.com)  
[tbuono@littler.com](mailto:tbuono@littler.com)  
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8 Attorneys for Defendant  
AFFORDABLE STRIPING & SEALING, LLC  
9

10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA  
12

13 JAMARKUS PORTER, an individual,

14 Plaintiff,

15 v.

16 AFFORDABLE STRIPING & SEALING, LLC,  
a Nevada Limited Liability Company; DOES I  
17 through X, inclusive; ROE BUSINESS  
ENTITIES XI through XX, inclusive,

18 Defendants.  
19

Case No. 2:25-cv-01151-GMN-DJA

**STIPULATION AND ORDER TO  
EXTEND DEADLINE FOR  
DEFENDANT TO RESPOND TO  
PLAINTIFF'S MOTION TO REMAND  
(ECF NO. 12) AND DEFENDANT'S  
REPLY IN SUPPORT OF MOTION TO  
DISMISS (ECF NO. 6)**

**(FIRST REQUEST)**

20 **IT IS HEREBY STIPULATED** by and between Plaintiff Jamarkus Porter ("Plaintiff")  
21 and Defendant Affordable Striping and Sealing, LLC ("Defendant"), by and through their  
22 respective counsel of record, hereby agree and stipulate to extend the time for Defendant to file a  
23 response to Plaintiff's Motion to Remand from the current deadline of August 5, 2025, up to and  
24 including **August 19, 2025** and to extend the time for Defendant to file a reply in support of their  
25 Motion to Dismiss from the current deadline of August 7, 2025, up to and including **August 21,**  
26 **2025.**

27 This Stipulation is submitted and based upon the following:  
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1           1.       On June 26, 2025, Defendant removed the action to this Court. (*See* ECF No. 1).  
2 Thus, Plaintiff must file a Motion to Remand within 30-days of the removal, on or before July 25,  
3 2025. (*See* 28 U.S.C. § 1447(c)).

4           2.       On July 3, 2025, Defendant filed a Motion to Dismiss Plaintiff's Complaint. (ECF  
5 No. 6). Plaintiff filed a response to the Motion to Dismiss on July 31, 2025. (ECF No. 14).  
6 Defendant's Reply in Support of the Motion to Dismiss is due on August 7, 2025.

7           3.       On July 22, 2025, Plaintiff filed a Motion to Remand. (ECF No. 12). Defendant's  
8 Opposition to the Motion to Remand is due on August 5, 2025.

9           4.       The undersigned counsel for Defendant has depositions scheduled almost daily in  
10 another matter between July 30, 2025 until August 13, 2025. Due to the timing of the Motion and  
11 counsel's deadlines in other cases, Defendant needs additional time to file its Reply in Support of  
12 the Motion to Dismiss and to respond to the Motion to Remand.

13           5.       The Parties have agreed to extend the deadline for Defendant to file its Reply in  
14 Support of the Motion to Dismiss by two-weeks, from August 7, 2025, until **August 21, 2025**.

15           6.       The Parties have agreed to extend the deadline for Defendant to file its Response  
16 to Plaintiff's Motion to Remand by two-weeks, from August 5, 2025, until **August 19, 2025**.

17           7.       This is the first stipulation to extend the time for Defendant to file its Reply in  
18 Support of the Motion to Dismiss and to file its Response to Plaintiff's Motion to Remand.

19           8.       The Parties believe these circumstances constitute good cause for granting an  
20 extension. *See* Fed. R. Civ. P. 6(b)(1).

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1           9.       This Stipulation is made in good faith and not for the purpose of delay.

2  
3       Dated: August 1, 2025

Dated: August 1, 2025

4       Respectfully submitted,

Respectfully submitted,

5  
6       /s/ Marian L. Massey

/s/ Taylor A. Buono


7       Jemma E. Dunn, Esq.  
8       Matthew T. Hale, Esq.  
9       Marian L. Massey, Esq.  
10       GREENBERG GROSS LLP

Roger L. Grandgenett, Esq.  
Taylor A. Buono, Esq.  
LITTLER MENDELSON, P.C.

11       Attorneys for Plaintiff  
12       JAMARKUS PORTER, an individual

Attorney for Defendant  
AFFORDABLE STRIPING & SEALING, LLC

13                       **IT IS SO ORDERED.**

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15                       \_\_\_\_\_  
16                       **U.S. District Judge**

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19       4899-3743-1129.1 / 109069.1004

20                       Dated: August 4, 2025